

February 1, 2010

Google, Inc.  
Attn: Google Legal Support, Blogger DMCA Complaints  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

*Via CMRRR*

*and Via Facsimile (650) 618-2680; Attn: Blogger Legal Support, DMCA Complaints*

**RE: *Remove Your Content, LLC v. Mark Bochra and John Does 1-20;***  
**Case No. 3:09-CV-393 in the United States District Court for the Northern**  
**District of Texas, Dallas Division**

Dear Blogger DMCA Complaints:

This firm represents Remove Your Content, LLC ("Remove Your Content") in the above referenced lawsuit. I am writing to request the removal of certain blogs which contain both defamatory and copyright and trademark protected information.

Furthermore, the blogs were posted with unauthorized use of an individual's (Alondra Dimas Aguillon) AT&T wireless internet account. The blogs are:

Removeyourcontentscam.blogspot.com

Removeyourcontentsucks.blogspot.com

Removeyourcontentfake.blogspot.com

Removeyourcontentsuck.blogspot.com

Removeyourcontenttruth.blogspot.com

Because of Remove Your Content's specialization and success in getting copyright infringing material removed, Remove Your Content and its owner, Eric Green, have attracted attention from individuals who target and consistently distribute illegal and pirated content on the internet. Remove Your Content and Mr. Green have become the target of "hate blogs" on the internet which use Remove Your Content's copywritten materials, as well as disseminate false information and threats against Mr. Green.

In an effort to determine who was posting these blogs, we obtained IP information from Google. With this information, we were able to subpoena AT&T and obtain the relevant account information for the IP address. The AT&T customer, Alondra Dimas Aguillon, has executed an affidavit that confirms that she did not post the blogs in question. Ms. Dimas Aguillon has 2 small children and lives by herself and did not authorize anyone to use her account. Further, Ms. Dimas Aguillon is requesting the removal of the blogs (which were posted with her AT&T account).

I have enclosed the following exhibits regarding the blogs:

- 1) Subpoena to Google, Inc.;
- 2) Response from Google, Inc. identifying IP addresses;
- 3) Subpoena to AT&T;
- 4) Response from AT&T with Affidavit;
- 5) Affidavit from Alondra Dimas Aguillon; and
- 6) Recent DMCA Notice regarding the blogs.

Given that it is apparent that someone is illegally using AT&T accounts to anonymously post infringing and defamatory blogs, please remove the blogs in question. We are requesting that Google confirm in writing that the blogs will be removed.

Please contact me with any questions related to this matter. Thank you in advance for your cooperation, and we look forward to hearing from you.

Sincerely,



Ellen Cook Sacco

*Enclosures*

cs:  
Client

# EXHIBIT “1”



Issued by the  
UNITED STATES DISTRICT COURT

Northern

DISTRICT OF

Texas

Remove Your Content, LLC  
V.  
Mark Bochra

SUBPOENA IN A CIVIL CASE

Case Number:<sup>1</sup> 3:09-cv-393

TO: Google, Inc.

Via its registered agent  
Corporation Service Company  
701 Brazos, Suite 1050, Austin, TX

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See exhibit 1.

PLACE

DATE AND TIME

Records may be sent to 2912 W. Story Rd., Irving, TX 75038

Nov. 10, 2009

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Ellen Sacco, Hulse Stucki, PLLC, 2912 W. Story Rd., Irving, TX 75038

(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

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**PROOF OF SERVICE**


---

DATE

PLACE

**SERVED**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

---

**DECLARATION OF SERVER**


---

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

---

**Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006:**


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**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (e)(3)(B)(ii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information; or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party; or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject

to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) **CONTEMPT.** Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate excuse for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).

## EXHIBIT 1

### DOCUMENTS TO BE PRODUCED:

- 1) Any and all documents reflecting the identity of the author(s) of the following blogs (including email addresses and IP addresses associated with logins to the blogs):

Removeyourcontentscam.blogspot.com

Removeyourcontentsucks.blogspot.com

Removeyourcontentfake.blogspot.com

Removeyourcontentsuck.blogspot.com

Removeyourcontenttruth.blogspot.com

# EXHIBIT "2"

Google Inc.  
1600 Amphitheatre Parkway  
Mountain View, California 94043



Tel: 650.253.3425  
Fax: 650.249.3429  
www.google.com

RECEIVED

NOV 30 2009

HULSE STUCKI

November 24, 2009

*Via Facsimile and Express Courier*  
(214)441-3001

Ellen Sacco  
Hulse Stucki, PLLC  
2912 W. Story Rd.  
Irving, TX 75038  
(214)441-3000

**Re: Subpoena dated 10-16-2009, *Remove Your Content, LLC v. Mark Bochra*,  
United States District Court, Northern District of Texas, Case Number 3:09-cv-  
393 (Internal Ref. No. 63115-75063)**

Dear Ellen Sacco:

Pursuant to the Subpoena issued in the above-referenced matter, we have conducted a diligent search for documents and information accessible on Google's systems that are responsive to your request. Our response is made in accordance with state and federal law, including the Electronic Communications Privacy Act. See 18 U.S.C. § 2701 et seq. By this response, Google does not waive any objection to further proceedings in this matter.

We understand that you have requested customer information regarding the user account specified in the Subpoena, which includes the following information: (1) Subscriber and recent IP information for multiple Blogger accounts.

To the extent any document provided herein contains information exceeding the scope of your request, protected from disclosure or otherwise not subject to production, if at all, we have redacted such information or removed such data fields.

Finally, Google requests reimbursement in the amount of \$125 for reasonable costs incurred in processing your request. Please forward your payment to Google Custodian of Records, at the address above and please write the Internal Reference Number (63115-75063) on your check. The federal tax ID number for Google is 77-0493581.

Very truly yours,

LYS

Kalynn Yastro  
Legal Investigations Support



**Blog Owner**

User Key: 825933571344  
 Username: nwdnewa@gmail.com  
 First name:  
 Last name:  
 Email: nwdnewa@gmail.com  
 AdSense PubID:  
 Date created: 2009-03-15T14:03:21.425Z

**User's Blogs**

Blog ID	Name	URL	Membership
8988287963465798000	Removeyourcontent.com Gold Digger	http://removeyourcontentscam.blogspot.com/	ADMIN
201154725576543938	Removeyourcontent.com Scam	http://removeyourcontentsucks.blogspot.com/	ADMIN
8061092577433285629	Removeyourcontent.com Sueing Megaporn.com	http://removeyourcontentfake.blogspot.com/	ADMIN
9053313085221404014	Removeyourcontent.com Scam	http://removeyourcontentsuck.blogspot.com/	ADMIN
4220701678583886017	Removeyourcontent.com Sues Megaupload	http://removeyourcontenttruth.blogspot.com/	ADMIN

**User's Trashed Blogs**

Blog ID	Name	URL	Membership
1985184546057311549	Eric Green Sucks	http://ericgreensux.blogspot.com/	ADMIN
5015344622447964763	Removeyourcontent.com Gold Diggers	http://ericgreenscam.blogspot.com/	ADMIN

**User's Mobile Aliases**

Alias Associated Blog

**Blog Information**

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=201154725576543938, clientIP=99.141.13.0, date=Sun Mar 15 07:07:57 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=4220701678583886017, clientIP=99.141.13.0, date=Sun Mar 15 07:10:34 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=8061092577433285629, clientIP=99.141.13.0, date=Sun Mar 15 07:11:56 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=8988287963465798000, clientIP=99.141.13.0, date=Sun Mar 15 07:08:54 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=9053313085221404014, clientIP=99.141.13.0, date=Sun Mar 15 07:07:12 PDT 2009

# **EXHIBIT “3”**

Issued by the  
UNITED STATES DISTRICT COURT

Northern

DISTRICT OF

Texas

Remove Your Content, LLC

V.

Mark Bochra

SUBPOENA IN A CIVIL CASE

Case Number:<sup>1</sup> 3:09-cv-393

TO: AT&T Internet Services  
Attn: Rhonda Compton  
1010 N. St. Mary's Street, Room 315-A-02  
San Antonio, TX 78215

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):  
See Exhibit A attached hereto.

PLACE

Hulse Stucki, PLLC, 2912 W. Story Rd., Irving, TX 75038

DATE AND TIME

12/30/2009 5:00 am

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

11/30/09

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Ellen Sacco, 2912 W. Story Rd., Irving, TX 75038; (214) 441-3000

(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

**PROOF OF SERVICE**

DATE

PLACE

**SERVED**

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

**Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006:**

**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly conducts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information; or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party; or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject

to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) DUTIES IN RESPONDING TO SUBPOENA.**

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation materials, the person making the claim must notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) **CONTEMPT.** Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate excuse for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).



**DOCUMENTS TO BE PRODUCED:**

- 1) All customer/subscriber identifying information (including name, address, etc.) identifying the customer using the following IP addresses: 99.141.13.0. For reference of dates, times, and time zones, please see document attached hereto.



req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=201154725576543938, clientIP=99.141.13.0, date=Sun Mar 15 07:07:57 PDT 2009

Google Confidential and Proprietary

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=4220701678583886017, clientIP=99.141.13.0, date=Sun Mar 15 07:10:34 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=8061092577433285629, clientIP=99.141.13.0, date=Sun Mar 15 07:11:56 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=8988287963465798000, clientIP=99.141.13.0, date=Sun Mar 15 07:08:54 PDT 2009

\*\*\*\*\*

req=POST /post-create.do HTTP/1.1, host=www.blogger.com, referer=http://www.blogger.com/post-create.g?  
blogID=9053313085221404014, clientIP=99.141.13.0, date=Sun Mar 15 07:07:12 PDT 2009

# EXHIBIT “4”



TO: Ellen\_Cook\_Sacco\_Esq  
Company:  
Fax: 2144413001  
Phone:

FROM: COMPTON, RHONDA K (ATTSI)  
Fax:  
Phone:

---

**NOTES:**

Reference ID 35355

Number of pages including cover: 05

Date and time of transmission: Wednesday, December 30, 2009 3:07:24 PM

© 2009 AT&T Intellectual Property. All rights reserved. AT&T, the AT&T logo and all other AT&T marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies.



AT&T Internet Services  
Legal Compliance Dept.  
1010 N. St. Mary's St.,  
Suite 315-A2  
San Antonio, TX 78215

T: 210.351.5129  
F: 707.435.8409

# Fax

To: Ellen Cook Sacco, Esq. Fax: 214.441.3001 From: Rhonda Compton

---

To: Fax: Date: December 30, 2009  
Re: Civil Subpoena Response Pages: 4

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☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

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•Comments:

The information contained in this facsimile message may be confidential and/or legally privileged information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any copying, dissemination or distribution of confidential or privileged information is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone, and we will arrange for the return of the facsimile. Thank you.



Rhonda K. Compton  
AT&T Internet Services  
Legal Compliance Dept.  
1010 N. St. Mary's St.,  
Suite 315-A2  
San Antonio, TX 78215

T: 210.351.5129  
F: 707.435.6409

---

December 30, 2009

Ellen Cook Sacco, Esq.  
HULSE STUCKI  
2912 West Story Rd.  
Irving, TX 75038

Re: Subpoena re: IP Address 99.141.13.0 /*Remove Your Content, LLC vs. Mark  
Bochra*/Issued by the U.S. District Court Northern District of Texas/Case No.  
3:09-cv-393

OUR REFERENCE ID #35355

Dear Ms. Sacco:

This letter shall serve as the response of AT&T Internet Services (AT&T) to the above referenced subpoena dated November 30, 2009. In response to the above-referenced subpoena, below please find the basic subscriber information for this account.

***Regarding IP 99.141.13.0 on all dates/times/time zone as listed in the subpoena:***

**CUSTOMER NAME:** Alondra Dimas

**ADDRESS:** 10305 S. Nashville Ave., Chicago Ridge, IL 60415

**TELEPHONE NUMBER:** 708.499.5451

Also, enclosed is the IP assignment details for this session.

Further, due to increased demands on AT&T resources from third parties seeking its data, AT&T is forced to require compensation for costs in responding to these type of subpoenas – as allowed by rules of procedure and applicable case law. AT&T charges a flat rate of \$60.00 **per search**. Depending upon the nature of the request, this fee is charged **per IP address search** and/or **per email address search**. The fee for this request will be \$60.00. Please forward a check in the amount of \$60.00 payable to "AT&T Internet Services" and mail to the address listed above.

Please contact me with questions or concerns.

Best regards,

A handwritten signature in black ink, appearing to read "Rhonda Compton".

Rhonda Compton  
AT&T Internet Services  
Legal Compliance Dept.

---

***AT&T Internet Services*****IP Assignment Details**

<b>Date &amp; Time (GMT)</b>	<b>Status</b>	<b>Username</b>	<b>Assigned IP</b>
09 MAR 2009 10:39:16	Start	ramzie02@att.net	99.141.13.0
18 MAR 2009 22:02:16	Stop	ramzie02@att.net	99.141.13.0



***AT&T Internet Services*****Business Records Certification**

**Rhonda Compton, the undersigned, hereby declares:**

1. I am a United States citizen and over eighteen years of age.
2. I am employed by AT&T as Internet Legal Compliance Manager. My job responsibilities include retrieving AT&T Internet Services records responsive to legal process for such records.
3. AT&T Internet Services was served with legal process for business records described there in. A copy of the legal process is attached.
4. The following are responsive:
  - a) Attached hereto is a true copy of the available records described in the legal process.
  - b) Attached hereto is a true copy of the results of our search, assembly, and production.
5. I affirm these records:
  - a) were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
  - b) were kept in the course of the regularly conducted activity; and
  - c) were made by the regularly conducted activity as a regular practice.

This declaration was made in the State of Texas and I affirm, under penalty of perjury, that the foregoing is true and correct.

Executed on this 30<sup>th</sup> day of December, 2009



**Rhonda Compton**  
Manager, Internet Legal Compliance  
AT&T Internet Services  
1010 North St. Mary's St., Rm. 315-A2  
San Antonio, TX 78215  
210.351.5129

# EXHIBIT “5”

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**REMOVE YOUR CONTENT, LLC,****Plaintiff,****v.****MARK BOCHRA,****Defendant**

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**CASE NO. 3:09-cv-393**

**AFFIDAVIT OF ALONDRA AGUILLON**

I, Alondra Aguillon, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following statements are true and correct, and further that this affidavit is made on my personal knowledge and that I am competent to testify as to the matters stated herein:

1. My name is Alondra Aguillon. My former name is Alondra Dimas. I have never been convicted of a felony or crime of moral turpitude. I am over the age of 21, and I am of sound mind and capable of making this Affidavit.
2. My home address is 10305 Nashville Avenue, Chicago Ridge, IL 60415. My home telephone number is (708) 845-0106. My email is [ramzie02@yahoo.com](mailto:ramzie02@yahoo.com).
3. I am making this Affidavit in response to a letter I received from AT&T regarding my internet services and a subpoena.
4. It is my understanding that AT&T has identified my account as having the IP address 99.141.13.0. It is my understanding that the IP address 99.141.13.0 is connected with the creation of various blogs, including:

[Removeyourcontentscam.blogspot.com](http://Removeyourcontentscam.blogspot.com)

[Removeyourcontentsucks.blogspot.com](http://Removeyourcontentsucks.blogspot.com)

[Removeyourcontentfake.blogspot.com](http://Removeyourcontentfake.blogspot.com)

[Removeyourcontentsuck.blogspot.com](http://Removeyourcontentsuck.blogspot.com)

[Removeyourcontenttruth.blogspot.com](http://Removeyourcontenttruth.blogspot.com)

5. I did not create or authorize the creation of any of the blogs:

Removeyourcontentscam.blogspot.com

Removeyourcontentsucks.blogspot.com

Removeyourcontentfake.blogspot.com

Removeyourcontentsuck.blogspot.com

Removeyourcontenttruth.blogspot.com

6. I do not know who created any of the blogs:

Removeyourcontentscam.blogspot.com

Removeyourcontentsucks.blogspot.com

Removeyourcontentfake.blogspot.com

Removeyourcontentsuck.blogspot.com

Removeyourcontenttruth.blogspot.com

7. I am the only adult in my household. I have a 6 year old daughter and an infant who are the only other people who live with me. I do not allow others to use my computer or internet account.

8. At the time that there were logins from my account to the blogs in question in March of 2009, I had a young infant.

9. I am following up with AT&T to make sure that there will not be any unauthorized wireless or other use of my AT&T internet services.

10. I am requesting that the following blogs which AT&T shows were created using my IP 99.141.13.0 and account be removed by Google and/or blogger, because I did not authorize their creation or use of my AT&T internet account to create such blogs:

Removeyourcontentscam.blogspot.com

Removeyourcontentsucks.blogspot.com

Removeyourcontentfake.blogspot.com

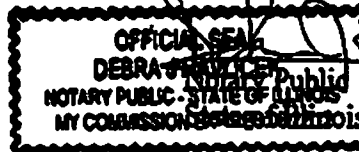
Removeyourcontentsuck.blogspot.com

Removeyourcontenttruth.blogspot.com



Alondra Aguillon

20 10 SWORN TO AND SUBSCRIBED before me on the 26 day of Jan



# EXHIBIT “6”



Removeyourcontent® , LLC  
391 E. Las Colinas Blvd Ste 130-609  
Irving, TX 75039-6225  
USA  
Ph: 214-377-9891  
Fax: 214-484-2640  
E-mail: [dmca@removeyourcontent.com](mailto:dmca@removeyourcontent.com)  
1/30/2010 6:56:39 PM

**DMCA Notice**

re: <http://www.blogspot.com>

Gentlemen:

Please take appropriate action to disable access to the infringing materials described below, in accordance with the provisions of the Digital Millennium Copyright Act of 1998 and the Berne Convention. Should you require further information regarding this matter, please feel free to contact me.

Regards,

Eric Green - Owner

<https://www.removeyourcontent.com>

<http://www.copyright.gov/onlinesp/agents/r/removeyl.pdf>

**ELECTRONIC NOTICE OF COPYRIGHT INFRINGEMENT**

I, the undersigned, CERTIFY UNDER PENALTY OF PERJURY that I am an agent authorized to act on behalf of the owner of certain intellectual property rights, said owner being named:

Removeyourcontent LLC

<https://www.removeyourcontent.com>

I have a good faith belief that the items or materials listed below are not authorized by the above IP Owners, their agents, or the law and therefore infringe the IP Owner's rights. Please act expeditiously to remove or disable access to the material or items claimed to be infringing.

I may be contacted at:

Printed Name: Eric Green

Title: Owner

Company: Removeyourcontent, LLC

Street Address: 391 E. Las Colinas Blvd Ste 130-609

City and State: Irving, TX

Country: USA

Postal code: 75039-6225

Email (correspondence): [dmca@removeyourcontent.com](mailto:dmca@removeyourcontent.com)

Telephone: (214) 377-9891

Fax: (214) 484-2640

<https://www.removeyourcontent.com>

Truthfully,

/S/: Eric Green

Allegedly Infringing items or materials:

Hosted copyrighted media - removeyourcontent.com

Indexed and linked copyrighted media

Unauthorized use of Trademark

Infringed Work or Right:

©Copyright Removeyourcontent LLC

<https://www.removeyourcontent.com>

Trademark

Word Mark: REMOVEYOURCONTENT

Goods and Services: IC 045. US 100 101. G & S: Legal services, namely, online copyright enforcement for others.

FIRST USE: 20071001. FIRST USE IN COMMERCE: 20071201

Service mark: Serial Number 77604591

Filing Date: October 30, 2008

Registration Number: 3600651

Original Materials & Copyright Holder(s):

Removeyourcontent®, LLC

391 E. Las Colinas Blvd Ste 130-609

Irving, TX 75039-6225

USA

Ph: 214-377-9891

Fax: 214-484-2640

E-mail: [dmca@removeyourcontent.com](mailto:dmca@removeyourcontent.com)

Location of Original Works:

<https://www.removeyourcontent.com>

URL(s) of Infringed Works or Right:

<http://www.removeyourcontentscam.blogspot.com>

<http://www.removeyourcontentsucks.blogspot.com>

<http://www.removeyourcontentfake.blogspot.com>

<http://www.removeyourcontentsuck.blogspot.com>

<http://www.removeyourcontenttruth.blogspot.com>

Regards,

Eric Green, President

Removeyourcontent® LLC

391 Las Colinas Blvd E Suite 130-609 Irving, TX 75039 USA

Phone: 214-377-9891 | Fax: 214-484-2640  
<https://www.removeyourcontent.com>

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Regards,  
Eric Green, President  
Removeyourcontent@ LLC  
391 Las Colinas Blvd E Suite 130-609 Irving, TX 75039 USA  
Phone: 214-377-9891 | Fax: 214-484-2640  
<https://www.removeyourcontent.com>

**FW: [#604123059] Blogger Complaint**

From: **Ellen Sacco** (esacco@AttorneysForBusiness.com)

Sent: Mon 4/05/10 7:19 AM

To: 'Mark Bochra' (mbochr2@live.com)

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Mark,

Attached is the latest response from Google, per your request.

Ellen

-----Original Message-----

From: Blogger Help [mailto:support@blogger.com]

Sent: Thursday, March 11, 2010 2:29 PM

To: Ellen Sacco

Subject: Re: [#604123059] Blogger Complaint

Hello,

We have received your DMCA complaint dated 3-5-10. At this time, Google has decided not to take action based on our policies concerning content removal. As always, we encourage you to resolve any disputes directly with the owner of the website in question.

If you pursue legal action against this site that results in the removal of the offending material, our search results will display this change after we next crawl the site. If the webmaster makes these changes and you need us to expedite the removal of the cached copy, please submit your request using our webpage removal request tool at <http://www.google.com/webmasters/tools/removals>

We note again that Blogger.com and Blogspot.com are US sites regulated by US law. Blogger is a provider of content creation tools, not a mediator of that content. We allow our users to create blogs, but we don't make any claims about the content of these pages. Given these facts, and pursuant with section 230(c) of the Communications Decency Act, Blogger does not remove allegedly defamatory, libelous, or slanderous material from Blogger.com or BlogSpot.com without a court order.

If you do acquire a court order please supply us with a copy so we may comply with its terms.

Sincerely,  
The Blogger Team

E-mail message checked by Spyware Doctor (6.0.0.386)

Database version: 5.14540

<http://www.pctools.com/en/spyware-doctor-antivirus/>

No virus found in this incoming message.

Checked by AVG - [www.avg.com](http://www.avg.com)

Version: 8.5.436 / Virus Database: 271.1.1/2734 - Release Date: 03/11/10  
07:33:00